

STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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October 7, 1994

File No. 2199.9285 (JN)

Mr. Tom Lanphar

Department of Toxic Substances Control

700 Heinz Avenue, Suite 200

Berkeley, CA 94710

**Subject: Site 15 Final Removal Action, Action Memorandum, Naval Air Station (NAS)
Alameda, August 12, 1994**

Dear Mr. Lanphar:

Regional Water Quality Control Board staff have reviewed the above-mentioned workplan. Staff have a few comments on this report. The comments center around making the Action Memorandum consistent with the earlier documents submitted for the site 15 removal action, namely the Final Engineering Evaluation/Cost Analysis (EE/CA), dated August 12, 1994

1. (Page 3, Site Characteristics, second paragraph), The second sentence needs to state that both "PCB's (and lead) have been detected in most surface-soil and soil boring samples . . ." This would be consistent with Section 2.3.2.2, Analytical Results, of the final EE/CA.

2. (Page 4, Release or Threatened Release, last paragraph), The last sentence is only half-true. It needs to be expanded to include what is stated in the second paragraph of page 2-7 of the final EE/CA: "However, PCB's and lead could affect the Oakland Inner Harbor . . . RI/FS for NAS Alameda"

3. (Figure 6, Estimated Extent of Soil Remediation), The sixth item in the legend needs to say only, "Estimated Extent of Excavation of Soil Containing Lead". This is a 'zero-line' for only lead, not PCB's and lead.

4. (Page 9, Proposed Action Description, second paragraph), Please take out, "that requires no further risk evaluation (DTSC 1994)", when the Action Memorandum discusses the lead cleanup level. The final EE/CA does not say this in Section 2.8 Removal Action Objectives, when it mentions the lead interim cleanup level.

5. (Page 11, Applicable or Relevant and Appropriate Requirements), Please add the term 'interim' in the first sentence of the second paragraph, to make it clear that these are interim goals.

If you have any questions on the above comments, please contact me at (510) 286-0301.

Thank You,

James Nusrala

Remedial Project Manager

1122